

FEB 25 2025

FEDERAL DISTRICT COURT
NORFOLK, VA

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT/ARREST WARRANT

Your affiant, John T. Slayton, being duly sworn and deposed, states the following:

1. Your affiant is a Special Agent (S/A) with Department of Homeland Security, Homeland Security Investigation (HSI) and has been so employed since June 10, 2001. Your affiant is currently assigned to an investigation regarding a drug trafficking organization (DTO) that is involved in the transportation and distribution of cocaine.

2. Your affiant makes this affidavit in support of an application for an arrest warrant for the following individuals:

- a. **Ramon Antonio MERCEDES**
- b. **Dani SEVERINO**
- c. **Edward Alesander DURAN**
- d. **Julio Ludi ABRERA**
- e. **Abel Antonio CRUZADO**

3. This request for an arrest warrant is made in relation to the following offenses occurring in the Eastern District of Virginia (EDVA) and elsewhere:

- a. Manufacture, Distribution, or Possession with intent to distribute a Controlled Substance on a vessel in violation of Title 46, U.S.C. Section 70503(a)(1)

FACTS AND CIRCUMSTANCES

4. Since November 2018, Special Agents and Task Force Officers assigned to the Department of Homeland Security (HSI), working in conjunction with Drug Enforcement Administration (DEA) Special Agents assigned to the Hampton Post of Duty, have been investigating maritime smuggling operations occurring within International Waters.

5. On February 17, 2025, while on routine patrol in international waters, the United States Coast Guard Cutter VALIANT utilizing a maritime patrol aircraft located a Go-Fast Vessel (GFV) occupied by five individuals approximately 45 nautical miles north of Cabron, Dominican Republic. U.S. Coast Guard personnel observed several packages as well as fuel barrels on the

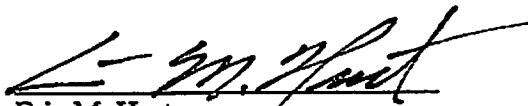
deck of the GFV which is consistent with narcotics smuggling. U.S. Coast Guard personnel subsequently launched an over the horizon small boat with a boarding team. When the U.S. Coast Guard small boat boarding team attempted to make contact with the GFV, the GFV sped away and the GFV crew members began to jettison packages into the ocean. Upon obtaining positive control of the GFV, U.S. Coast Guard personnel identified the five crew members as Ramon Antonio MERCEDES, Dani SEVERINO, Edward Alesander DURAN, Julio Ludi ABRERA and Abel Antonio CRUZADO.

6. There were no indicia of nationality observed on the vessel and when asked about the nationality of the vessel, all crew members claimed that the vessel was from the Dominican Republic. The government of the Dominican Republic could neither confirm nor deny nationality of the vessel. U.S. Coast Guard personnel recovered from the ocean around the GFV sixteen bales containing approximately 580 kilograms of cocaine, a Schedule II narcotic controlled substance. All five mariners found aboard the GFV were detained and are being transferred to the Eastern District of Virginia for prosecution.

Based on the above, I believe that there is probable cause to believe that a violation of Title 46 U.S.C., Section 70503 has been committed by, **Ramon Antonio MERCEDES, Dani SEVERINO, Edward Alesander DURAN, Julio Ludi ABRERA and Abel Antonio CRUZADO.**

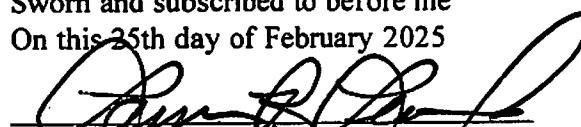


John T. Slayton
Special Agent
U.S. Department of Homeland Security



Eric M. Hurt
Assistant United States Attorney

Sworn and subscribed to before me
On this 25th day of February 2025



Lawrence R. Leonard
United States Magistrate Judge
Norfolk, Virginia